

EXHIBIT A

STATE OF INDIANA)
) SS:
 COUNTY OF JEFFERSON)
 CAUSE NO. **39C01-2011-CT-00814**

KATHLEEN ROUSCH)
)
 Plaintiff)
)
 v.)
)
 MAC'S CONVENIENCE STORES LLC)
 (d/b/a CIRCLE K))
)
Serve Registered Agent:)
 Corporation Service Company)
 135 North Pennsylvania Street)
 Suite 1610)
 Indianapolis, Indiana 46204)
)
 Defendant)

COMPLAINT AND JURY DEMAND

Plaintiff, Kathleen Rousch, by counsel, states as follows for her Complaint:

1. At all relevant times, Plaintiff Kathleen Rousch permanently resided and was domiciled in Trimble County, Kentucky.
2. At all relevant times, Defendant Mac's Convenience Stores LLC (d/b/a Circle K) was a Delaware Foreign Limited Liability Company with a principle office located at 4080 W Jonathan Moore Pike, Columbus, IN 47201, that owned, controlled, operated, and maintained a convenience store and gas station located at 224 E. 2nd Street, Madison, Indiana, 47250, through its owners, members, managers, employees, agents and assigns.
3. This lawsuit alleges a tort injury that occurred in Jefferson County, Indiana, making this Court a proper and preferred venue to hear the action.

4. On or about May 24, 2019, Plaintiff was a business invitee at Defendant's Circle K store located at 224 E. 2nd Street, Madison, Indiana, 47250, to purchase a drink when she fell into a hole located in the parking lot.

5. Ms. Rousch did not see the hole, nothing was drawing her attention to the hole, and she was otherwise exercising ordinary care for her own safety.

6. Known to Defendant, but unknown to Ms. Rousch, Defendant had negligently and carelessly failed to remedy or warn of the hazard caused by the hole in the parking lot, creating an unreasonably dangerous condition for invitees on the property.

7. As a direct and proximate result of Defendant's negligence, Ms. Rousch sustained serious bodily injury.

8. As a direct and proximate result of her bodily injury, Plaintiff has and/or will incur in the future the following damages: medical bills and expenses, loss of income, pain, suffering, and inconvenience, and permanent impairment.

WHEREFORE, Plaintiff demands judgment in her favor against Defendant and compensatory damages, as shown by evidence, for the following: past and future medical and related expenses, past and future pain, suffering, inconvenience, loss of income, and permanent impairment.

Plaintiff further demands **TRIAL BY JURY**, judgment interest (where allowed by law), costs and expenses (where allowed by law), and any other relief the Court believes just and proper.

Respectfully Submitted,

s/ Brandon W. Smith

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Counsel for Plaintiff

JURY DEMAND

Pursuant to TR 38(B), Plaintiff demands trial by jury on all triable issues.

s/ Brandon W. Smith

Counsel for Plaintiff